

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554  
July 1, 2013

RE: Petition RM-11699

Dear Commission:

In regards to the petition RM-11699, the petition to allow encryption over amateur radio, I am opposed to the potential wording used by the petitioner as well as to encryption in general.

I don't feel that "intercommunications when participating in emergency services operations or related training exercises which **may** involve information covered by HIPAA or other sensitive data" is worded to protect the openness of amateur radio (emphasis mine). Using the term "may" allows any event - 5k walk/runs, marathons, bike rides, and even fairs and festivals (since there's ALWAYS the possibility that someone will get hurt and require medical attention). This is a bit far-reaching, in my opinion. Furthermore, I don't like that there is no other limit placed on this, such as acceptable frequency ranges (I somehow think that encrypting communications on HF is not something IARU would like).

In general, I am opposed to encryption. Encryption poses extreme difficulty in allowing OOs and volunteers to police the content that is transmitted over amateur radio. Additionally, it would add a level of complexity that is not necessary and would likely create many user problems due to varying levels of competency on encryption equipment, protocols, and standards. Additionally, "logistical information concerning medical supplies [and] personnel movement", I would certainly hope this information is not trusted with an amateur radio operator, but perhaps the military (which DOES have the lawful ability to encrypt communications).

I also think this would hamper participation for amateur radio operators in service events in two ways - one would be fewer numbers and the other would be equipment failures. If a served agency came told me that I had to purchase equipment in order to assist them, the answer is no, and I don't think I'm unique in that feeling. If they purchased the equipment for me, I would likely still assist, but my ability to overcome equipment problems may be limited. I have worked with a handful of local RACES/ARES and other deployments of amateurs, including marathons (with nearly 5,000 runners), triathlons, and the county fair. I have had my share of problems due to equipment failures and user errors, all of which I've been able to overcome due to my knowledge of my equipment.

Thank you,

Andrew Rohne, KE8P